

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

STEFANIA DAIDONE MANIACI,
*individually on behalf of herself and others
similarly situated,*

Plaintiffs,

v.

KISS MY FACE CORPORATION, KISS
MY FACE, LLC and BYCMAC CORP.,
Defendants.

Case No.

**DECLARATION OF LETITIA
BAVIELLO**

I, Letitia Baviello, declare as follows:

1. I am Chief Financial Officer with Kiss My Face, LLC, a Defendant in this matter. I have
2. I submit this declaration in support of Defendant Kiss My Face, LLC's Notice of Removal. I make this declaration based upon my own personal knowledge, except where otherwise indicated, and if called upon to testify as a witness, I could and would competently testify thereto.
3. Kiss My Face, LLC (not Kiss My Face Corporation or Bycmap Corp.) is the entity responsible for the manufacture and sale of the Kiss My Face products at issue in the above referenced matter.
4. I reviewed the sales records created and kept in the course of Kiss My Face, LLC's normal business activities for the six varieties of body lotion and the eight varieties of body wash identified in the Complaint in the above titled action for the time period of March 3, 2014 through the present.
5. During the above identified time period, Kiss My Face, LLC, has sold over 100,000 units of the six varieties of the lotion and over 225,000 units of the eight varieties of the body wash for a total of more than 330,000 units.

I declare under the penalty of perjury that the foregoing is true and correct.

DATED: June 6, 2017

By:


LETITIA BAVIELLO